

ReedSmith

David E. Wilks
Direct Phone: 302.778.7560
Email: dwilks@reedsmit.com

Reed Smith LLP
1201 Market Street
Suite 1500
Wilmington, DE 19801-1163
302.778.7500
Fax 302.778.7575

September 6, 2006

Via Electronic Filing and Hand Delivery

The Honorable Kent A. Jordan
U.S. District Court, District of Delaware
844 North King Street, Room 4209
Lock Box 18
Wilmington, DE 19801

Re: Tilley v. Pfizer, et al., Civil Action No. 06-513-KAJ

Dear Judge Jordan:

On August 31, 2006, we filed defendants' motion for stay pending MDL transfer. Plaintiff has now agreed to the relief sought in that motion and the parties have executed the enclosed stipulation and proposed order. In the event that this proposal is acceptable to Your Honor, we would appreciate the Court's entry of the order. In the event that Your Honor has questions or concerns, we are of course prepared to address them at any time.

Thank you for the Court's consideration.

Respectfully submitted,

REED SMITH LLP

/s/ David E. Wilks
David E. Wilks
(Del. ID. No. 2793)

DEW:rs

cc: District Court Clerk (via Electronic Filing)
All Counsel (via Electronic Filing)

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KELLY A. TILLEY, as Personal Representative of the Estate of DANA ANDREW TILLEY, Deceased,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Civil Action No.06-00513-KAJ
	:	
PFIZER INC., PARKE-DAVIS, a division of Warner-Lambert Company and Warner-Lambert Company LLC,	:	
WARNER-LAMBERT COMPANY and WARNER-LAMBERT COMPANY LLC,	:	
	:	
Defendants.	:	

**STIPULATION AND (PROPOSED) ORDER
TO STAY PROCEEDINGS PENDING MDL TRANSFER**

Plaintiff, Kelly A. Tilley, as personal representative of the Estate of Dana Andrew Tilley, and Defendants Pfizer Inc. and Warner-Lambert Company LLC, successor to Warner-Lambert Company LLC, on its own behalf and on behalf of its unincorporated division, Parke-Davis (collectively, the "Parties"), by their undersigned counsel, hereby stipulate and agree as follows:

1. The relief sought by Defendants in their Motion to Stay Proceedings Pending MDL Transfer filed on August 31, 2006 is now unopposed and shall therefore be deemed granted; and
2. All pretrial activity in this case, including, but not limited to, any and all motions challenging this Court's jurisdiction or to remand, if any, the deadline set forth in the

Court's letter to counsel dated August 30, 2006 and any other discovery and pretrial deadlines, shall be stayed pending transfer of this case to *In re Neurontin Marketing, Sales Practices and Products Liability Litigation*, MDL Docket No. 1629, for coordinated and consolidated pretrial proceedings.

Respectfully submitted,

/s/ L. Vincent Ramunno

L. Vincent Ramunno (Del. Bar I.D. 594)
RAMUNNO RAMUNNO & SCERBA, P.A.
903 North French Street
Wilmington, DE 19801-3399
Telephone: 302.656.9400
Facsimile: 302.656.9344
Attorneys for Plaintiff

/s/ David E. Wilks

David E. Wilks (Del. Bar I.D. 2793)
REED SMITH LLP
1201 Market Street, Suite 1500
Wilmington, DE 19801-1163
Telephone: 302.778.7500
Facsimile: 302.778.7575
Attorneys for Defendants

Of Counsel:

Andrew Finkelstein
Kenneth B. Fromson
Finkelstein & Partners
436 Robinson Avenue
Newburgh, New York 12550
Telephone: 800.529.2676

Of Counsel:

Scott W. Sayler
Douglas B. Maddock, Jr.
SHOOK, HARDY & BACON L.L.P.
2555 Grand Blvd.
Kansas City, Missouri 64108-2613
Telephone: 816.474.6550
Facsimile: 816.421.5547

IT IS SO ORDERED this _____ day of _____, 2006.

The Honorable Kent A. Jordan

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

KELLY A. TILLEY, as Personal Representative of the Estate of DANA ANDREW TILLEY, Deceased,	:	Civil Action No. 06-CV-513
Plaintiff,	:	
vs.	:	
PFIZER INC., PARKE-DAVIS, a division of Warner-Lambert Company and Warner-Lambert Company LLC,	:	
WARNER-LAMBERT COMPANY and WARNER-LAMBERT COMPANY LLC,	:	
Defendants.	:	

CERTIFICATE OF SERVICE

I, David E. Wilks, hereby certify that on the 6th day of September, 2006, I caused a true and correct copy of a *Stipulation and (Proposed) Order to Stay Proceedings Pending MDL Transfer* to be served on the counsel for the plaintiff listed below, via electronic CM-ECF:

Andrew Finkelstein, Esq.
FINKELSTEIN & PARTNERS, LLP
436 Robinson Avenue
Newburgh, New York 12550

L. Vincent Ramunno, Esq.
RAMUNNO, RAMUNNO & SCERBA, P.A.
903 French Street
Wilmington, DE 19801

Dated: September 6, 2006

/s/ David E. Wilks
David E. Wilks (DE ID 2793)